REMARKS

This Amendment and Response to Non-Final Office Action is being submitted in response to the non-final Office Action mailed December 2, 2005. Claims 1, 3-18, and 20-27 are pending in the Application. Claims 1, 3-18, and 20-27 stand rejected. Specifically, Claims 1, 3-5, 10-14, and 17 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978). Claims 6-8 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Barrett et al. (U.S. Pat. No. 6,782,420). Claims 9, 16, 18, 20, 26, and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Chen et al. (U.S. Pat. No. 6,625,590). Claims 9, 16, 18, 20, 26, and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978), Chen et al. (U.S. Pat. No. 6,625,590), and Barrett et al. (U.S. Pat. No. 6,782,420).

In response to these rejections, Claims 1, 3, 11, 12, and 18 have been amended to further clarify the subject matter which Applicants regard as the invention, without prejudice or disclaimer to continued examination on the merits. These amendments are fully supported in the Specification, Drawings, and Claims of the Application and no new matter has been added. Based upon the amendments, reconsideration of the Application is respectfully requested in view of the following remarks.

Rejection of Claims 1, 3-5, 10-14, and 17 under 35 U.S.C. 103(a):
Rangachar et al. and Kekic et al.:

Claims 1, 3-5, 10-14, and 17 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978). While Examiner admits that Rangachar et al. lack various features of Applicants' invention, Examiner concludes that it "would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Rangachar ... as taught by Kekic" in order to "efficiently manage a changing, growing robust, and secure heterogeneous network."[1]

Rangachar et al. teach a method of managing a communications network wherein commands given to one switch in the network are diverted to the network manager. The network manager processes the commands to identify generic commands to transmit to other switches in the network. The generic commands are interpreted at each of the one or more switches to produce a respective instruction to direct operation of each of the one or more switches.

Independent Claim 1 recites:

> 1. (Currently Amended): A method of managing a telecommunications network device, comprising:
> registering at least one command executable by an application with one of a plurality of distributed command proxies associated with a <u>common</u> command interface, said command proxy being local to the application;
> registering the command through the command proxy local to the application with a central command daemon associated with said <u>common</u> command interface;
> <u>providing a user interface comprising a command line interface and a web interface;</u>
> receiving the command at the <u>common</u> command interface from ~~a user interface~~ <u>either of said command line interface and said web interface;</u>
> forwarding the command to the application; and
> completing execution of the command;

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[1] See Office Action page 5, paragraph 1.

wherein said common command interface receives commands in a plurality of formats.

Rangachar et al. do not teach or suggest the use of a plurality of user interfaces to provide a command to a common command interface, wherein said common command interface is capable of receiving commands in a plurality of formats. The common command interface recited in independent Claim 1 is utilized by commands provided in ASCII from a command line interface, and by the commands in HTML from a web interface. This is simply not taught or suggested by Rangachar et al.

Further Kekic et al. do not remedy the deficiencies of Rangachar et al. Like Rangachar et al., Kekic et al. also teach a method of forwarding generic commands to different network elements. Also like Rangachar et al., Kekic et al. are silent as to using a plurality of user interfaces to provide a command to a common command interface, wherein said common command interface receives commands in a plurality of formats. The common command line interface recited in independent Claim 1 is utilized by commands provided in ASCII from a command line interface, and by the commands in HTML from a web interface. This is simply not taught or suggested by Kekic et al.

In view of the amendments to the claims, the deficiencies of Rangachar et al. are simply not remedied by the disclosure of Kekic et al. Therefore, Applicants submit that the rejection of Claims 1, 3-5, 10-14, and 17 under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) has now been overcome and respectfully request that this rejection be withdrawn.

Rejection of Claims 6-8, and 15 under 35 U.S.C. 103(a):

Rangachar et al., Kekic et al., and Barrett et al.:

Claims 6-8 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Barrett et al. (U.S. Pat. No. 6,782,420). While Examiner admits that the Rangachar/Kekic combination does not teach or suggest an API interface for application development, Examiner concludes that it "would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Rangachar to enable usage of an Application Programming Interface in application development as taught by Barrett ... in order to enable efficient communications between a management server and distributed client."[2]

Assuming that the references are properly combined, Barrett et al. still do nothing to remedy the problem explained by Applicants on page 3 of the Application as filed, namely that an API has to be maintained for each supported format. It is with this problem that the present invention is concerned.

Independent Claim 1 recites:

> 1.   (Currently Amended):   A method of managing a telecommunications network device, comprising:
> registering at least one command executable by an application with one of a plurality of distributed command proxies associated with a common command interface, said command proxy being local to the application;
> registering the command through the command proxy local to the application with a central command daemon associated with said common command interface;
> providing a user interface comprising a command line interface and a web interface;
> receiving the command at the common command interface from a user interface either of said command line interface and said web interface;
> forwarding the command to the application; and
> completing execution of the command;

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[2] See Office Action page 11, final paragraph, through page 12, first paragraph.

wherein said common command interface receives commands in a plurality of formats.

Barrett et al. do not teach or suggest the use of a plurality of user interfaces to provide a command to a common command interface, wherein said common command interface receives commands in a plurality of formats. The common command interface recited in independent Claim 1 is utilized by commands provided in ASCII from a command line interface, and by the commands in HTML from a web interface. This is simply not taught or suggested by Barrett et al.

In view of the amendments to the claims, the deficiencies of Rangachar et al. are simply not remedied by the disclosure of Kekic et al. and Barrett et al. Therefore, Applicants submit that the rejection of Claims 6-8 and 15 under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Barrett et al. (U.S. Pat. No. 6,782,420) has now been overcome and respectfully request that this rejection be withdrawn.

Rejection of Claims 9, 16, 18, 20, 26, and 27 under 35 U.S.C. 103(a):
Rangachar et al., Kekic et al., and Chen et al.:

Claims 9, 16, 18, 20, 26, and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Chen et al. (U.S. Pat. No. 6,625,590). While Examiner admits that the Rangachar/Kekic combination lacks various features of Applicants' invention, Examiner concludes that it "would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Rangachar ... as taught by Chen" in order to "enable a flexible and robust user interface for network management control."[3]

Chen et al. teach a command line interface for a network management platform that includes a parser to parse and validate inputs entered at a command line. The command line can be equipped with input assistance facility that causes the output facility to present a prompt for each of a plurality of attribute manes that specifies possible attribute values.[4] However, Chen et al. is silent as to the use of a plurality of user interfaces to provide a command to a common command interface, wherein said common command interface receives commands in a plurality of formats. The common command interface recited in independent Claim 1 is utilized by commands provided in ASCII from a command line interface, and by the commands in HTML from a web interface. This is simply not taught or suggested by Chen et al.

In view of the amendments to the claims, the deficiencies of Rangachar et al. are simply not remedied by the disclosure of Kekic et al. and Chen et al. Therefore, Applicants submit that the rejection of Claims 9, 16, 18, 20, 26, and 27 under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978) and Chen et al. (U.S. Pat. No. 6,625,590) has now been overcome and respectfully request that this rejection be withdrawn.

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[3] See Office Action page 13, paragraph 3.
[4] See US Pat No 6625590, Abstract.

Rejection of Claims 9, 16, 18, 20, 26, and 27 under 35 U.S.C. 103(a):
Rangachar et al., Kekic et al., Chen et al., and Barrett et al.:

Claims 9, 16, 18, 20, 26, and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978), Chen et al. (U.S. Pat. No. 6,625,590), and Barrett et al. (U.S. Pat. No. 6,782,420). While Examiner admits that the Rangachar/Kekic/Chen combination does not disclose each feature of the rejected claims, Examiner concludes that it "would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Rangachar to enable usage of an Application Programming Interface in application development as taught by Barrett ... in order to enable efficient communications between a management server and distributed client."[5]

The combinations of both Rangachar/Kekic/Barrett and Rangachar/Kekic/Chen are discussed in the appropriately titled sections above. Just as those combinations do not teach or suggest the claims as amended, the combination of all four of the references also does not teach or suggest the claims as amended.

In view of the amendments to the claims, the deficiencies of Rangachar et al. are simply not remedied by the disclosure of Kekic et al., Chen et al., and Barrett et al. Therefore, Applicants submit that the rejection of Claims 9, 16, 18, 20, 26, and 27 under 35 U.S.C. 103(a) as being unpatentable over Rangachar et al. (U.S. Pat. No. 6,301,252) in view of Kekic et al. (U.S. Pat. No. 6,664,978), Chen et al. (U.S. Pat. No. 6,625,590), and Barrett et al. (U.S. Pat. No. 6,782,420) has now been overcome and respectfully request that this rejection be withdrawn.
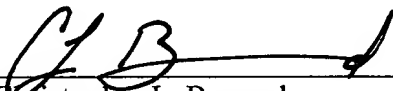
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[5] See Office Action page 16, first paragraph.

CONCLUSION

Applicants would like to thank Examiner for the attention and consideration accorded the present Application. Should Examiner determine that any further action is necessary to place the Application in condition for allowance, Examiner is encouraged to contact undersigned Counsel at the telephone number, facsimile number, address, or email address provided below. It is not believed that any fees for additional claims, extensions of time, or the like are required. However, if such additional fees are required, Examiner is encouraged to notify undersigned Counsel at Examiner's earliest convenience.

Respectfully submitted,

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